

APPENDIX B

APPENDIX B – PLAINTIFF’S WITNESS LIST**PLAINTIFF FINJAN, INC.’S LIST OF FACT AND EXPERT WITNESSES**

United States District Court
For the Northern District of California (San Francisco Division)

Finjan, Inc. v. Juniper Networks, Inc.

Case No. 17-cv-05659-WHA

Trial Date: December 10, 2018

Plaintiff Finjan, Inc. (“Finjan”) identifies the following witnesses whom it may call live or by deposition at trial. This list is not a commitment that Finjan will call any particular witness at trial, or a representation that any of the witnesses listed are available or will appear for trial. If any third-party witness is unavailable, Finjan reserves the right to use his or her deposition testimony. With respect to Juniper Networks, Inc.’s (“Juniper”) witnesses, Finjan reserves the right to introduce testimony through deposition or live examination, as appropriate. Finjan also reserves the right to call any witnesses listed or called by Juniper, and to revise this list in light of further rulings by the Court, including any rulings regarding the amount of time allotted for the parties to present their case at trial, or any other changed circumstances.

I. FACT AND EXPERT WITNESSES**A. Witnesses That Finjan Will Call in its Case in Chief:**

Witness	Substance of Testimony
Dr. Kevin Arst	Non-cumulative testimony regarding the damages owed to Finjan
Dr. Harry Bims	Non-cumulative testimony regarding a tutorial of the technology involved in this case
Dr. Eric Cole (expert)	Non-cumulative testimony regarding Juniper’s infringement of U.S. Patent No. 8,677,494 (the “’494 Patent”); background of the ‘494 Patent; background of the Accused Products; background of cyber security
John Garland	Non-cumulative testimony regarding Finjan’s licensing negotiations with Juniper; notice to Juniper of its infringement of the ‘494 Patent
Philip Hartstein, President of Finjan	Non-cumulative testimony regarding Finjan’s business and licensing of its patents

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Witness	Substance of Testimony
David Kroll	Non-cumulative testimony regarding the field of the art at the time of the invention
Dr. Alessandro Orso	Non-cumulative testimony regarding the patentability of the ‘494 Patent

B. Witnesses That Finjan Will Call by Deposition:

Witness	Substance of Testimony
Coonan, Scott	Non-cumulative testimony regarding notice of infringement and damages owed to Finjan for Juniper’s infringement.
Mathena, Raju	Non-cumulative testimony regarding the technology of the accused products and Juniper’s infringement of the ‘494 Patent.
Nagarajan, Chandra	Non-cumulative testimony regarding the technology of the accused products and Juniper’s infringement of the ‘494 Patent.
Tenorio, Yuly	Non-cumulative testimony regarding the technology of the accused products and Juniper’s infringement of the ‘494 Patent.

C. Witnesses That Finjan May Call by Deposition:

Witness	Substance of Testimony
Bushong, Mike	Non-cumulative testimony regarding the technology of the accused products, Juniper’s infringement of the ‘494 Patent, and damages owed to Finjan for Juniper’s infringement.
Gupta, Shelly	Non-cumulative testimony regarding damages owed to Finjan for Juniper’s infringement.
Manocha, Rakesh	Non-cumulative testimony regarding the technology of the accused products and Juniper’s infringement of the ‘494 Patent.
McKenzie, Meredith	Non-cumulative testimony regarding notice of infringement and damages owed to Finjan for Juniper’s infringement.